

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Jointly Administered

**URGENT MOTION FOR EXTENSION OF TIME TO OBJECT TO BEST INTEREST
ANALYSIS OF DISCLOSURE STATEMENT**

TO THE HONORABLE COURT:

COME NOW, Salud Integral de la Montaña, Inc. (SIM), through its undersigned attorney and respectfully states as follows:

1. As the undersigned was sitting down to write SIM's objections to the Disclosure Statement, which are due next June 15, 2021, the Financial Oversight and Management Board

filed *Analysis of Creditor Recoveries should the Title III Case be Dismissed for Creditors of the Commonwealth of Puerto Rico*. This analysis is required by section 314(b)(6) of PROMESA. The document is 107 pages long and it is of vital importance to the Disclosures Statement and the Plan.

2. The Honorable Court set deadlines for the disclosure statement objections based on the filing and notice of the supporting documentation. The plan was filed on May 11, 2021 but it was only yesterday that this vital piece of information was filed.

3. This morning the undersigned reached out to the Board's attorneys requesting a 7 day extension to any objections to this document. The answer was "[a]s you know, the Best Interest analysis is something that 'is what it is'. It is not something for which further explanation is required. Additionally, the court has provided a short timeframe to respond to objections. Accordingly, we are unable to provide an extension."

4. The best interest analysis is part of the disclosure statement and plan. It is either informative or not. SIM has to read it and analyze in order to determine if any objections will be made to it. Moreover, the short timeframe to respond to objections was the Board's doing since it wanted to expedite the disclosure statement approval. Movant had nothing to do with it nor the delay in providing the best interest analysis. For all of the above, movant requests a 7 day extension to file any objections to the best interest analysis provided yesterday by the Board.

NOTICE

5. Notice of this Urgent Motion has been provided to the following entities, or their counsel, if known: (i) the U.S. Trustee; (ii) the Office of the U.S. Attorney for the District of Puerto Rico; (iii) AAFAF; (iv) FOMB; (v) the Official Committee of Unsecured Creditors; (vi) the Official Committee of Retired Employees of the Commonwealth of Puerto Rico; and (vii) all parties that have filed a notice of appearance in the above-captioned Title III cases.

CERTIFICATION

6. Pursuant to Section ¶ 1.H. of the CMP Order, the undersigned counsel hereby certify that they have: (a) carefully examined the matter and concluded that there is a true need for an urgent decision; (b) not created the urgency through any lack of due diligence; and (c) made reasonable, good-faith communications in an effort to resolve or narrow the issues before the Court. Further, as required by Local Bankruptcy Rule 9013-1(a)(2), the undersigned counsel certify that counsel has carefully examined the matter and concluded that there is a true need for expedited consideration of the Urgent Motion, and that the undersigned counsel have not created the urgency through lack of due diligence on their part.

7. No prior request for the relief requested herein has been made by Movant to this or to any other court.

WHEREFORE: SIM requests from the Honorable Court that grant a 7 day extension to file any objection to the best interest analysis provided yesterday.

Respectfully submitted on this 11th day of June, 2021.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd
John E. Mudd
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